

**Jose L. Gonzalez**

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**From:** Audrea Moore  
**Sent:** Thursday, July 21, 2016 4:11 PM  
**To:** kelly.gardner@usdoj.gov; mark.dann@usdoj.gov  
**Cc:** Marcos G. Ronquillo; Jose L. Gonzalez; Teresa Guerra Snelson; Tyler Independent Sc\_\_U\_S\_ of America v\_ T\_\_20036\_20\_ \_\_Email  
**Subject:** Tyler Independent School District - Unfiled Draft Motion For Unitary Status [IWOV-Legal.FID78528]  
**Attachments:** 2016.07.21 MGR LTR to DOJ Re Draft Motion For Unitary Status (001).pdf; DRAFT- TISD Motion for Declaration of Unitary Status (7 21 16).pdf  
**Importance:** High

Ms. Gardner,

Please see attached correspondence from Mr. Ronquillo in the above referenced matter. Please let me know if you have any questions or issues regarding receipt of the attached documents.

Thank you

*Audrea S. Moore*

*Paralegal*

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July 21, 2016

VIA E-MAIL: Kelly.gardner@usdoj.gov

Ms. Kelly Gardner  
Trial Attorney  
US Department of Justice  
Civil Rights Division  
Educational Opportunities Section  
950 Pennsylvania Ave. NW  
Washington, D.C. 20530

Re: Unfiled Draft Motion for Unitary Status  
United States of America v. Tyler Independent School District, Et al.  
No. 6:70-CV-5176

Dear Ms. Gardner,

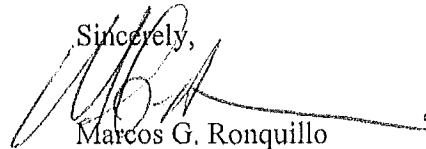
Per the Court initiated conference call on Tuesday, July 19, 2016, and our agreement to submit an unfiled draft Motion for Unitary Status on or before **Noon** on July 22, 2016, please find attached to this email the above referenced document.

Please let us know when we can meet to discuss possible settlement once you have had a chance to review our motion.

Also we would like to schedule a time when we can confer on preparing and filing a Status Report to the Court that is due by **5:00 pm on August 5, 2016.**

Thank you.

Sincerely,



Marcos G. Ronquillo

MGR/dbc

Enclosure

cc: Mark Dann -Via e-mail: [mark.dann@usdoj.gov](mailto:mark.dann@usdoj.gov)  
Jose L. Gonzalez -Via e-mail: [jgonzalez@fjrpllc.com](mailto:jgonzalez@fjrpllc.com)  
Teresa Guerra Snelson - [tguerrasnelson@fjrpllc.com](mailto:tguerrasnelson@fjrpllc.com)